

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

DRAFT

Conditional Major, Construction / Operating

Permit: F-07-005

WW Welding, Inc.

Frenchburg, KY 40322

Date January 11, 2007

Sajjad Quabili, Reviewer

SOURCE ID: 21-165-00011

SOURCE A.I. #: 81517

ACTIVITY ID: APE20060001

**SOURCE DESCRIPTION:**

WW Welding manufactures metal septic tanks. The source applied to construct an additional building to manufacture and paint metal waste containers. The process includes a paint booth, a dip tank, welding machines and plasma cutters.

**COMMENTS:**

WW Welding is potentially major for VOC emissions. The source accepted federal enforceable limit for VOC emissions to become a conditional major source.

**EP 01 (Paint booth):** The paint booth consists of two applicators. Applicator #1 will be involved with spraying primers while Applicator #2 will be involved with spraying top coats. The capacity of each applicator is 23.4 gallons per hour. The paint booth will be equipped with panel filters to control particulates. No control equipment is utilized for VOC emissions.

**EP 02 (Asphalt dip coating for septic tanks):** This emission point represents an unheated asphalt dip coating used for metal septic tanks. No PM/PM10 emission is expected from the dip tank as there is no atomization of the products. No control equipment is utilized for VOC and HAP emissions.

**EP 03 (Plasma cutters):** This emission point represents the miscellaneous welding operation in the tank manufacturing process. The potential to emit particulate matter for EP 03 is 1.72 pound per hour. The allowable PM emissions limit for EP 03 is 2.34 pounds per hour. Therefore, particulate emission is assumed in compliance.

**Applicable regulations:**

**401 KAR 59:010,** New process operations, applicable to EP 01 and EP 02, which are not subject to another emission standard with respect to particulate, commenced on or after July 2, 1975.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

The source wide VOC emission limit is 90 tons during any consecutive 12 month period.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.